

Feeding Toddlers in the School Breakfast and National School Lunch Programs

Requirements for feeding Toddlers in NSLP and SBP

Children from one to two years of age, who participate in the School Breakfast Program (SBP) and, National School Lunch Program (NSLP) must be offered complete meals that meet the meal pattern requirements based upon their age. Foods for toddlers must have a texture and consistency that is appropriate for their ages.

All of the following criteria must be met in order for School Food Authorities (SFA's) to provide and claim meals served to toddlers (ages 1-2 years) in the NSLP and SBP:

- 1. The children must be enrolled in the Local Education Agency (LEA) through a Federal Early Head Start Program.
- 2. The SFA's meal counting and claiming procedures on file with the State Agency <u>must</u> include the procedures for counting and claiming meals served children 1 2 years of age (toddlers).
- 3. All children must be on a signed list from the Federal Head Start Coordinator to establish their directly certified status.
- 4. Meals served must be planned to comply with the required meal pattern.
- 5. Meal counts must be based on point of service meal counts.
- 6. Required recordkeeping must be maintained to support the meals claimed for reimbursement.

At a minimum, schools must offer the food items in the quantities specified for the appropriate age/grade group in the following table*:

Breakfast Meal Pattern

Food components and food items	Ages 1-2 Years Old
MILK (fluid) (as a beverage, on cereal, or both)	4 fluid ounces
JUICE/FRUIT/VEGETABLE: Fruit and/or vegetable; or full-strength fruit juice or vegetable juice	1/4 cup
SELECT ONE SERVING FROM EACH OF THE FOLLOWING COMPONENTS, TWO FROM ONE COMPONENT, OR AN EQUIVALENT COMBINATION:	
GRAINS/BREADS:	
Whole-grain or enriched bread	1/2 slice
Whole-grain or enriched biscuit, roll, muffin, etc.	1/2 serving
Whole-grain, enriched or fortified cereal	1/4 cup or 1/3 ounce
MEAT OR MEAT ALTERNATIVES:	
Meat/poultry or fish	1/2 ounce
Alternate protein products ¹	1/2 ounce
Cheese	1/2 ounce
Large egg	1/2
Peanut butter or other nut or seed butters	1 tablespoon
Cooked dry beans and peas	2 tablespoons
Nuts and/or seeds (as listed in program guidance) ²	1/2 ounce
Yogurt, plain or flavored, unsweetened or sweetened	2 ounces or 1/4 cup

¹Must meet the requirements in appendix A of 7 CFR 210.

²No more than 1 ounce of nuts and/or seeds may be served in any one breakfast.

^{*}Schools may offer additional foods with breakfasts to children over one year of age.

Lunches must offer the food components and quantities specified in the following meal pattern:

Lunch Meal Pattern

Food components and food items	Ages 1-2 Years Old
MILK (fluid) (as a beverage)	6 fluid ounces
MEAT or MEAT ALTERNATES:	
Lean meat, poultry, or fish	1 ounce
Alternate Protein Products ¹	1 ounce
Cheese	1 ounce
Large egg	1/2
Cooked dry beans and peas	1/4 cup
Peanut butter or other nut or seed butters	2 tablespoons
Yogurt, plain or flavored, unsweetened or sweetened	4 ounces or 1/2 cup
The following may be used to meet no more than 50% of the requirement and must be used in combination with any of the above:	
Peanuts, soy nuts, tree nuts, or seeds, as listed in program guidance, or an equivalent quantity of any combination of the above meat/meat alternate (1 ounce of nuts/seeds = 1 ounce of cooked lean meat, poultry or fish)	1/2 ounce = 50%
VEGETABLE or FRUIT: 2 or more servings of vegetables, fruits or both	1/2 cup
GRAINS/BREADS (servings per week): Must be enriched or whole grain. A serving is a slice of bread or an equivalent serving of biscuits, rolls, etc., or 1/2 cup of cooked rice, macaroni, noodles, other pasta products or cereal grains	5 servings per week ² —minimum of 1/2 serving per day

¹Must meet the requirements in Appendix A of 7 CFR 210.

²For the purposes of this table, a week equals five days.

Breakfast and Lunch Requirements

Meals must include, at a minimum, each of the food components, in the amount that is indicated.

For breakfast and lunch there are four (4) components:

- 1. Milk
- 2. Juice/Fruit/Vegetable
- 3. Grains/Breads
- 4. Meat or Meal Alternate

One food item from each component is required to be offered at breakfast (four food items). At lunch one (1) food item from the milk, meat/meat alternate and grain/bread components must be offered daily, and 2 or more servings of the fruit and vegetable component must be offered.

The use of Offer versus Serve is highly encouraged. When utilizing Offer versus Serve for breakfast, schools must offer all four required food items (one food item from each component). Toddlers (ages 1-2 years old) may decline one of the four food items offered. The meal pattern must be met after the child's choices have been made in order to count the meal at the point of service to claim for reimbursement.

When utilizing Offer versus Serve for lunch, schools must offer all five required food items (five food items from the four components) and toddlers (ages 1-2 years old) may decline up to two (2) of the five food items offered. The meal pattern must be met after the child's choices have been made in order to count the meal at the point of service to claim for reimbursement.

USDA encourages schools to offer children a selection of foods at lunch whenever possible. By offering choices of different food items to meet meal pattern components, the school will be providing exposure to a variety foods and encourage consumption of the meals.

Schools must offer lunches during the period between 10 a.m. and 2 p.m. Some schools may wish to designate to serve toddlers over two service periods. Schools may divide the quantities and/or the menu items, foods, or food items offered each time any way they wish. This flexibility and the procedures that will be used to implement the meal service that will still meet all program requirements must be included in the SFA's meal counting and claiming procedures on file with the State Agency and approved before use. Potable water is recommended to be made available to this age group throughout the day, but is **required** to be made available to them during meal service.

Per SCN policy, NSLP memorandum 2012-02, family style meals are not eligible to be claimed for reimbursement on SBP and NSLP. For schools and districts that wish to adopt a family style meal service for children, the CACFP program may be an appropriate option in which reimbursement of the meals may be allowable.

Crediting Foods

Milk

It is highly recommended that only whole milk be served to children of one (1) year of age, but the preferences of the parent/guardian and the child's physician must be considered. Toddlers who are two (2) years of age should be provided 1% white milk, or fat free flavored or unflavored milk. All fluid milk served must be pasteurized fluid milk which meets State and local standards.

Non-dairy beverages can be provided in lieu of cow's milk when accompanied by a written request from the parent/guardian or a note signed by a licensed physician. However, the non-dairy beverage provided **must** be nutritionally equivalent to cow's milk (Policy Memo SP 35-2009). Juice or water cannot be substituted for milk for non-disabling conditions even with an accompanying note from the child's parent/guardian or physician.

Meat/Meat Alternate

<u>Meat</u>

The quantity of the meat/meat alternate component must be the edible portion as served. If the portion size of a food item for this component is excessive, the school must reduce that portion and supplement it with another meat/meat alternate to meet the full requirement. This component must be served in a main dish or in a main dish and only one other food item. Schools without daily choices in this component should not serve any one meat alternate or form of meat (for example, ground, diced, pieces) more than three times in the same week. Schools may adjust the daily quantities of this component provided that a minimum of one ounce is offered daily.

Meat Alternates

Cooked dry beans or peas may be counted as either a vegetable or as a meat alternate but not as both in the same meal.

Nuts and seeds and their butters are allowed as meat alternates in accordance with FNS guidance. Acorns, chestnuts, and coconuts must not be used because of their low protein and iron content. Nuts or seeds may be used to meet no more than one-half of the meat/meat alternate component with another meat/meat alternate to meet the full requirement. Refer to the Food Buying Guide to determine the portion size requirements.

Yogurt may be used to meet all or part of the meat/meat alternate requirement. Yogurt may be plain or flavored, and unsweetened or sweetened. Four ounces (weight) or ½ cup (volume) of yogurt equals one ounce of the meat/meat alternate requirement. *Noncommercial and/or non-standardized yogurt products, such as frozen yogurt, homemade yogurt, yogurt flavored products, yogurt bars, yogurt covered fruit and/or nuts or similar products are not creditable.

Vegetable/Fruit

Full strength vegetable or fruit juice may be used to meet no more than one-half of the vegetable/fruit requirement. Cooked dry beans or peas may be counted as either a vegetable or as a meat alternate but not as both in the same meal.

Grains/Breads

All grains/breads must be enriched or whole grain or made with enriched or whole grain meal or flour. Schools must offer daily at least one-half serving of the grain/bread component to toddlers who are 1-2 years of age. Schools which serve lunch at least 5 days a week shall serve a total of at least five servings of grains/breads per week.

The requirement for the grain/bread component is based on minimum daily servings plus total servings over a five day period. Schools serving lunch 6 or 7 days per week should increase the weekly quantity by approximately 20 percent (1/5th) for each additional day. When schools operate less than 5 days per week, they may decrease the weekly quantity by approximately 20 percent (1/5th) for each day less than five. The servings for biscuits, rolls, muffins, and other grain/bread varieties are specified in FNS guidance.

Civil Rights

All staff involved with providing meals to participant children or who interact with households about food that is provided to participant children must receive Civil Rights Training on an annual basis. Per FNS Instruction 113-1 this training should include the following topics: collection and use of data, effective public notification systems, compliance procedures, resolutions of noncompliance, and requirements for reasonable accommodations of persons with disabilities, requirements for language assistance, conflict resolution, and customer service. Staff should be knowledgeable on how to take a civil rights complaint and have access to the civil rights complaint form.

Meal Component Substitutions

Medical Statement for Participants with Special Dietary Needs

A special dietary needs form must be completed with all required information and signed by a licensed physician before a special dietary need can be accommodated. Attach a sheet with additional information if necessary. If changes are needed, the parent/guardian is required to submit a new form signed by the child's physician.

Disability

Under Section 504 of the *Rehabilitation Act of 1973*, and the *Americans with Disabilities Act* (ADA) of 1990, a "person with a disability" means any person who has a physical or mental impairment which substantially limits one or more major life activities, has a record of such impairment, or is regarded as having such impairment.

Major life activities covered by this definition include caring for one's self, eating, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning, and working.

USDA regulations **7 CFR Part 210 and Part 220** require substitutions or modifications in school breakfast and lunch meals for participants whose disabilities restrict their diets. A participant with a disability must be provided substitutions in foods when that need is supported by a statement signed by a licensed physician. The physician's statement must identify: the child's disability; an explanation of why the disability restricts the child's diet; the major life activity affected by the disability; the food or foods to be omitted from the child's diet, and the food or choice of foods that must be substituted.

Generally, children with food allergies or intolerances do not have a disability as defined under either Section 504 of the Rehabilitation Act or Part B of IDEA, and food service may, but is not required to, make food substitutions for them.

However, when in the licensed physician's assessment, food allergies may result in severe, life-threatening (anaphylactic) reactions, the child's condition would meet the definition of "disability," and the substitutions prescribed by the licensed physician must be made.

Special Dietary Needs That Are Not a Disability

Food service providers may make food substitutions, at their discretion, for individual children who do not have a disability, but who are medically certified as having a special medical or dietary need. Such determinations are only made on a case-by-case basis. This provision covers those children who have food intolerances or allergies but do not have life-threatening reactions (anaphylactic reactions) when exposed to the food(s) to which they have problems.

Each special dietary request must be supported by a statement, which explains the food substitution that is requested. It must be signed by a recognized medical authority. The medical statement must include: an identification of the medical or other special dietary condition which restricts the child's diet; the food or foods to be omitted from the child's diet; and the food or choice of foods to be substituted.

Record Keeping Requirements

Production Records

Schools or school food authorities, as applicable, must keep production and menu records for the meals they produce. These records must show how the meals offered contribute to the required food components and food quantities for each age/grade group every day. Production and menu records must be maintained in accordance with FNS guidance.

Meal Count Records

The number of reimbursable meals served for the SBP and the NSLP should be maintained for each meal service and then consolidated into a monthly total per the SFA's meal counting and claiming procedures.

Edit Checks

The children enrolled and the meals served must be included in the edit checks that are conducted on meal counts for each meal service and monthly prior claim submission for the school site.

Eligibility

All toddlers claimed in the SBP and NSLP must be enrolled in a Federal Early Start program and therefore would be directly certified. The SFA must have a signed list (provided annually) from the Federal Head Start Coordinator that identifies the children who are in the Federal Early Start program. This signed list is required to be maintained to establish either the individual child's eligibility in the SBP and NSLP or the inclusion of these children in a school identified student percentage in a community eligibility provision school.

Feeding Plan

As more solid foods are introduced, there should be a feeding plan in place in which parent/guardians acknowledge what foods will be introduced and when. Schools may develop a feeding plan in which the parent/guardians are made aware of and then are able to work with school staff to modify if desired. Or the school may elect to develop individual feeding plans with each parent/guardian.

Food Safety

Standard Operating Procedures and the associated record keeping must be in place to speak the preparation, storage and service of infant meals in the school sites Food Safety Plan as applicable. Appropriate temperature holding equipment should be utilized whenever food items or meals are transported from an alternate location. Children of this age are considered a highly susceptible population. Therefore, all food must be appropriately temperature held with hot holding and cold holding equipment and monitored until it is served (time as a temperature control cannot be used).

"The U.S. Department of Agriculture (USDA) prohibits discrimination against its customers, employees, and applicants for employment on the bases of race, color, national origin, age, disability, sex, gender identity, religion, reprisal, and where applicable, political beliefs, marital status, familial or parental status, sexual orientation, or if all or part of an individual's income is derived from any public assistance program, or protected genetic information in employment or in any program or activity conducted or funded by the Department. (Not all prohibited bases will apply to all programs and/or employment activities.)

If you wish to file a Civil Rights program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, found online at http://www.ascr.usda.gov/complaint_filing_cust.html, or at any USDA office, or call (866) 632-9992 to request the form. You may also write a letter containing all of the information requested in the form. Send your completed complaint form or letter to us by mail at U.S. Department of Agriculture, Director, Office of Adjudication, 1400 Independence Avenue, S.W., Washington, D.C. 20250-9410, by fax (202) 690-7442 or email at program.intake@usda.gov.

Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339; or (800) 845-6136 (in Spanish).